

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: ) BANKRUPTCY CASE  
          ) )  
MARIA D. PONCE, ) NO.: 16-40877-TAB  
          ) )  
Debtor.         ) CHAPTER 13  
          ) )  
                  ) JUDGE: TIMOTHY A. BARNES  
          ) )

**NOTICE OF FORBEARANCE AGREEMENT DUE TO THE COVID-19 PANDEMIC**

Now comes PennyMac Loan Services, LLC (“Creditor”), by and through undersigned counsel, and hereby submits Notice Forbearance Agreement to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of three (3) months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting November 1, 2020 through January 1, 2021. Debtor has requested to extend their forbearance period to include the mortgage payments May 1, 2021 through July 1, 2021.

Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable nonbankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Debtor will resume mortgage payments beginning August 1, 2021 and will be required to cure the delinquency created by the forbearance period (“forbearance arrears”).

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

In the event it is not the intent of the Debtor to extend the COVID-19 forbearance period, upon receipt of notification from the Debtor or Debtor's counsel, the forbearance extension will be cancelled, and this notice will be withdrawn.

Respectfully submitted,  
/s/Dana O'Brien  
Dana N. O'Brien, IL Bar No. 6256415  
Attorney for Creditor  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076  
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**CERTIFICATE OF SERVICE**

TO: SEE ATTACHED ADDRESSES

**CERTIFICATION**

I, the undersigned Attorney, Certify that I served a copy of this Order to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 N. Dearborn Suite 1200, Chicago, IL 60602 at 5:00 P.M. on May 27, 2021, with proper postage prepaid.

McCalla Raymer Leibert Pierce,  
LLC  
*/s/Dana O'Brien*  
\_\_\_\_\_  
ARDC# 6256415  
1 N. Dearborn Suite 1200  
Chicago, IL 60602  
(312) 346-9088

File No. PMHL-19-00502-2

**SERVICE LIST**

To Trustee:  
Marilyn O. Marshall  
224 South Michigan  
Suite 800  
Chicago, IL 60604

*by Electronic Notice through ECF*

To Debtor:  
Maria D. Ponce  
3624 W 56th St  
Chicago, IL 60629

*Served via U.S. Mail*

To Attorney:  
Joseph S Davidson  
Law Offices of Joseph P. Doyle, LLC  
105 S. Roselle Rd.  
Schaumburg, IL 60193

*by Electronic Notice through ECF*

McCalla Raymer Leibert Pierce, LLC  
Attorney For: Creditor  
1 N. Dearborn Suite 1200  
Chicago, IL 60602  
(312) 346-9088